

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Kristin Worth, Austin Dye,  
Axel Anderson, Minnesota Gun  
Owners Caucus, Second Amendment  
Foundation, Firearms Policy Coalition, Inc.,

Plaintiff,

v.

John Harrington, in his individual  
capacity and in his official capacity  
as Commissioner of the Minnesota  
Department of Public Safety, Don Lorge,  
in his official capacity as Sheriff of Mille  
Lacs County, Minnesota, Troy Wolbersen,  
in his official capacity as Sheriff of  
Douglas County, Minnesota, and Dan  
Starry, in his official capacity as Sheriff  
of Washington County, Minnesota,

Defendants.

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Case No. 21-cv-01348-KMM/LIB

**DEFENDANTS LORGE,  
WOLBERSEN, AND STARRY'S  
MOTION FOR SUMMARY  
JUDGMENT**

To: Above-named Plaintiffs, by and through their attorneys Blair W. Nelson, Blair W. Nelson, LTD., 205 7<sup>th</sup> Street N.W. Suite 3, Bemidji, MN 56601, and David H. Thompson, Peter A. Patterson, and William V. Bergstrom, Cooper & Kirk, 1523 New Hampshire Avenue, N.W., Washington D.C. 20036; and Defendant John Harrington, by and through his attorneys Minnesota Attorney General Keith Ellison and Assistant Attorney General Amanda Prutzman, 445 Minnesota Street, Suite 1100, St. Paul, Minnesota 55101.

**PLEASE TAKE NOTICE** that, pursuant to Federal Rule of Civil Procedure 56, Defendants Don Lorge, Troy Wolbersen, and Dan Starry (collectively, the “Defendant County Sheriffs”), hereby move for an order granting the Defendant County Sheriffs

summary judgment on all claims in Plaintiffs' Complaint. Said motion is based on all of the files, records and proceedings herein, including the Defendant County Sheriffs' memorandum of law, declarations and exhibits, and supporting documents filed herewith.

**RUPP, ANDERSON, SQUIRES &  
WALDSPURGER, & MACE, P.A.**

Dated: August 4, 2022

/s/ Kristin C. Nierengarten  
Scott T. Anderson (#157405)  
Kristin C. Nierengarten (#395224)  
Zachary J. Cronen (#397420)  
333 South Seventh Street, Suite 2800  
Minneapolis, MN 55402  
Phone: (612) 436-4300  
Fax: (612) 436-4340  
Email: scott.anderson@raswlaw.com  
kristin.nierengarten@raswlaw.com  
zachary.cronen@raswlaw.com

**ATTORNEYS FOR DEFENDANTS  
DON LORGE, TROY WOLBERSEN,  
AND DAN STARRY**